

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.
D.P., A.F., C.A., R.K., K.P.
and T.H.,
Plaintiffs,

PL Sum. J.
Ex. 024

CIVIL ACTION NO.:
1:20-CV-05263-MHC

vs.

RED ROOF INNS, INC.; FMW RRI
NC, LLC; RED ROOF FRANCHISING,
LLC; RRI WEST MANAGEMENT, LLC;
VAHARI HOTEL, LLC; WESTMONT
HOSPITALITY GROUP, INC.;
and RRI III, LLC,

Defendants.

C O N F I D E N T I A L
VIDEO DEPOSITION OF A.F.
August 31, 2022

9:11 a.m.

1960 Satellite Boulevard, Suite 4000
Duluth, Georgia
Carolyn M. Carboni, RPR, RMR, CCR-B-878
Leo Mileman, Videographer

W.K., et al v. Red Roof Inns, Inc., et al

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1 APPEARANCES OF COUNSEL:

2 On behalf of the Plaintiffs in W.K., et al. v. Red
3 Roof Inns, et al. case:

4 PATRICK J. McDONOUGH, ESQUIRE

5 Andersen Tate & Carr, PC

6 1960 Satellite Boulevard

7 Suite 4000

8 Duluth, Georgia 30097

9 770.822.0900

10 and

11 MICHAEL R. BAUMRIND, ESQUIRE (Via Zoom)

12 Bondurant Mixson & Elmore, LLP

13 1201 West Peachtree Street, Suite 3900

14 Atlanta, Georgia 30309

15 404.881.4100

16 On behalf of the Defendants Red Roof Inns, Inc.;
17 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI
18 West Management, LLC; Westmont Hospitality Group,
19 Inc.; and RRI III, LLC:

20 LILLIAN K. HENRY, ESQUIRE

21 PEYTON PATTERSON, ESQUIRE

22 Lewis Brisbois Bisgaard & Smith LLP

23 600 Peachtree Street, Suite 4700

24 Atlanta, Georgia 30308

25 404.348.8585

1 APPEARANCES (Continued):

2 Also Present:

3 Beth Richardson (via Zoom)

4

5

6

7

8 (Pursuant to Article 10(B) of the Rules

9 and Regulations of the Georgia Board of Court

10 Reporting, a written disclosure statement was

11 submitted by the court reporter to all counsel

12 present at the proceeding.)

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1 knowledge of this witness, it means that you don't
2 have personal knowledge of other employees?

3 A No. I have knowledge of -- okay. As I
4 said again, I've interacted with employees at the
5 Red Roof Inn, but I wouldn't know them by name.

6 Q Okay. What employees did you interact
7 with at the Red Roof -- and sorry. When we say
8 "Red Roof Inn," are you talking about Red Roof Inn
9 Smyrna?

10 A Yes.

11 Q Okay.

12 A Specifically, Red Roof Inn Smyrna.

13 Q All right. Which is located at 2200
14 Corporate Plaza Southeast, Smyrna, Georgia 30080,
15 right?

16 Okay. So from here on out, when I say Red
17 Roof Inn Smyrna or RRI Smyrna, we know we're
18 talking about that location?

19 A Yes.

20 Q Okay. Thanks.

21 And so what employees did you interact
22 with at Red Roof Smyrna?

23 A I interacted with front desk staff. I
24 interacted with housekeepers.

25 Q Do you remember any of their names?

1 A No.

2 Q What were these interactions like?

3 A Interactions to ask for extra things like
4 towels or sheets. Sometimes there's issues with,
5 like, internet connection, I would go talk to the
6 front desk person.

7 Q So did you use the internet a lot there?

8 A I don't know what we would define as a
9 lot, but yeah, it was used there.

10 Q Was it -- on which devices were you using
11 the internet for?

12 A Mostly, like, a computer, laptop.

13 Q Was it your own personal laptop?

14 A No.

15 Q Whose was it?

16 A [REDACTED].

17 Q All right. We'll discuss more about that
18 later after we get through this list.

19 We'll go to the next person, [REDACTED]
20 [REDACTED]. How do you know this person?

21 A As it says at the bottom, I don't have
22 personal knowledge of the witness.

23 Q I guess I'm trying to figure out how you
24 knew to list her here if you don't have personal
25 knowledge of her.

1 Q All right. So now I want to focus on the
2 years of 2010 and 2011. Actually, we're going to
3 flip to Exhibit 2, which is the original responses.
4 (Exhibit FA-4 marked.)

5 BY MS. HENRY:

6 Q I'm handing you what was marked as
7 Exhibit 4. Have you seen this before?

8 A Yeah.

9 Q And that's your signature on the last page
10 verifying that your responses to these
11 interrogatories are true and correct, correct?

12 A Yes.

13 Q And that you reviewed them?

14 A Yes.

15 Q Okay. So can you turn to your response to
16 interrogatory 12 which starts on page 18. All
17 right. Can you tell me how it all started? How
18 did you meet [REDACTED], and how did you go
19 from hanging out with him to being allegedly
20 trafficked?

21 A I met [REDACTED] when I was around 15 at a
22 mall. I think I told you about this earlier. He
23 was with friends. We ended up hanging out that
24 same day, and shortly after, started dating.

25 We broke up shortly after that and didn't

1 talk for a while. And then we became reacquainted
2 my senior year of high school.

3 Q And how did your relationship evolve into
4 you engaging in commercial sex?

5 A When we reacquainted when I was in high
6 school, [REDACTED] indicated that he had some modeling
7 jobs that could help me, you know, fund my college
8 and living or whatever while I was in school.

9 Q And he said it was modeling and nothing
10 else?

11 A Yeah. The first time he presented it to
12 me was as modeling only jobs. I can't say as time
13 progressed that he didn't flip that script, but
14 when we initially talked about it, he told me it
15 was for modeling.

16 Q So how many times did you talk about it
17 before you actually started working in the
18 industry?

19 A I can't really recall counting, but I'm
20 sure we talked about it at least a handful of
21 times.

22 Q Okay. And so each time was it only
23 modeling or did he ever eventually say -- or what
24 type of modeling did he say you would be doing?

25 A Modeling, taking, I guess you could say,

1 risque photos and pictures, webcam modeling, things
2 of that nature.

3 Q Okay. You said that you discussed this a
4 handful of times before you actually started
5 participating. As a sex worker, did -- before the
6 first time that you ever were with a john or with a
7 client or whatever you want to call it, did you and
8 [REDACTED] ever have a conversation that you would be
9 engaging in sexual activity with other people in
10 exchange for money?

11 A He told me that it was something that I
12 could offer, but he told me if I didn't want to,
13 then I didn't have to.

14 Q Okay. And so you said you first met him
15 when you were 15, right, at a mall?

16 A Yes.

17 Q Okay. Can you tell me about that? Like,
18 did you leave the mall together? And tell me about
19 that day exactly what you -- what you did.

20 A Yes, we did leave the mall together. We
21 went to 315 Mill Ridge Court. Hung out for a few
22 hours. Smoked some weed that he provided. And
23 then I went back home.

24 Q Was anyone else there?

25 A Yes, some of his friends.

1 Q But you eventually got back together?

2 A We did -- right. We did respark the
3 romance.

4 Q Okay. Did you think that you were in love
5 with him?

6 A When I ran back into him at the mall?

7 Q No. I guess over the course of your
8 relationship, were you in love with [REDACTED]?

9 A Yeah, at the time, I definitely felt like
10 I was in love. I can look back on it now and can
11 clearly know that that wasn't a real loving
12 relationship. But at the time, yeah, I definitely
13 felt like I was in love.

14 Q Okay. Did you -- and he proposed to you
15 that you would be modeling some, I guess, nude
16 modeling or cam girling, right?

17 A Yes.

18 Q Okay. And then he said that if you wanted
19 to, you could also have sex for money, right?

20 A I wouldn't put it like that, but yes, he
21 did tell me I could do extra services such as see
22 people in person, escort, maybe do nude dancing,
23 get paid to go on dates, et cetera, yes.

24 But he told me I wouldn't have to if I
25 didn't want to.

1 commercial sex and voluntarily giving their money
2 to someone else and then someone who is engaging in
3 commercial sex and being forced to give their money
4 to someone else? There's a difference between
5 those two, right?

6 A I mean, yes, the sentences you just said
7 are different, yeah. They have different words, so
8 they're different, but --

9 Q Well --

10 A -- they're very heavily related.

11 Q But one is voluntary and one is
12 involuntary; is that fair?

13 A That's what you said in your definitions,
14 yes. So that's what you just said. You said one
15 is voluntary and one is not. That's what you just
16 said, and yes, I agree it's what you said.

17 Q Okay.

18 MS. HENRY: I'm going to object to the
19 responsiveness of the answer, but I'll move on.

20 BY MS. HENRY:

21 Q So during 2010 to -- during your time with
22 [REDACTED], and we know it's spring of 2010, right,
23 that's when you started?

24 A Yeah.

25 Q And it ended sometime in fall or winter of

1 2011, right?

2 A Yeah.

3 Q All right. Did you ever voluntarily
4 prostitute yourself during that time frame?

5 A I did work independently on a few
6 occasions when I was able to leave [REDACTED] for some
7 days, yes, I did.

8 Q How many?

9 A Like how many times?

10 Q Uh-huh.

11 A Probably less than 20.

12 Q And this was when you were with [REDACTED]?

13 A I was able to -- well, I tried to leave
14 [REDACTED] after our trip to Barbados and did engage
15 in some independent work. But ultimately, he
16 sucked me back in with his manipulation, and I went
17 back to him.

18 Q So you mentioned after -- the first
19 time you left him was after Barbados?

20 A I tried to leave on occasions prior to
21 that, but it was met with physical and emotional
22 violence.

23 Q Okay. Tell me about the first time you
24 tried to leave.

25 A The first time that I can remember that I

1 tried to leave and I guess was met with violence
2 was when I was staying at my apartment on Windy
3 Hill with [REDACTED].

4 Q I'm sorry. Which Windy Hill address?
5 There was --

6 A Only my apartment, so 2121 Windy Hill.

7 Q Okay.

8 A And I tried to leave and I was in, like,
9 the front area of the apartment complex. And he
10 was sending me threatening text messages, asking
11 where I was. And he ultimately got me to go back
12 to the apartment with him.

13 Q And this was how long after you began
14 working with him?

15 A I'm not sure, but probably no more than
16 three months.

17 Q All right. So sometime in the summer of
18 2010?

19 A Late summer, yes.

20 Q And why were you trying to leave at that
21 point?

22 A Just wasn't -- it wasn't what he told me
23 that it was going to be. He told me, A, that I was
24 doing this or is going to be able to do it so I
25 could help put myself through college. He

1 ultimately ended up not letting me even enroll into
2 the university of -- or excuse me, into Georgia
3 State. I never got to enroll.

4 I wasn't being able to keep the money. I
5 mean, he told me that I was going to have a job,
6 and I would be expecting to get paid, and that
7 wasn't the case.

8 He was also being really mentally and
9 physically abusive. And it seemed like I could try
10 to get out at this time, but I wasn't able to.

11 Q All right. So you were trying to leave,
12 you were in the parking lot, and he texted you
13 threatening messages, and so you came back?

14 A Yes. He was also driving around in the
15 area, and yes, he drove past me, and I got back in
16 the car.

17 Q Okay. During your time with [REDACTED], were
18 you ever in control of choosing who and when to
19 have sex with for money?

20 A No. He told me that, you know, I wouldn't
21 have to do those sexual things if I didn't want to.
22 And when I indicated that I didn't want to, he just
23 completely -- just snapped.

24 Q So was he always there when you were with
25 a customer?

1 else? He didn't threaten you if you didn't leave
2 your parents' house?

3 A No. At this time, he wasn't being
4 threatening. He was actually being, you know,
5 pretty nice. It's crazy how much he changed after
6 he got me out of my parents' house and with all my
7 possessions, it's crazy how much he changed. But
8 no, he was nice. While he was getting me to move
9 out of my parents' house, he was really nice.

10 Q After you left with [REDACTED] in spring of
11 2010, did you ever see your parents again in 2010
12 or 2011?

13 A Yes.

14 Q When?

15 A I saw them on a few occasions. I think I
16 went back to the house to get some more items. I
17 also saw them -- I saw them at a Thanksgiving as
18 well as when I got out of jail for the first time.

19 Q So I think you listed three times: You
20 went back to get a few items, Thanksgiving, and
21 then did you say your dad bailed you out of jail?

22 A Yes.

23 Q Or your mom and your dad. And those were
24 three separate times?

25 A Yes.

1 Q The first time, when you went back to get
2 a few items, when was that?

3 A I don't recall. Sometime in 2010.

4 Q Do you know how long you had been with
5 [REDACTED] at that point?

6 A Not that long. Maybe a month.

7 Q All right. And did you go back to your
8 parents' house by yourself?

9 A No. Just keep in mind during this time
10 that I didn't have a driver's license nor a car.
11 So if I got somewhere, that [REDACTED] drove me.

12 Q Okay. Did [REDACTED] go inside of your
13 parents' house with you when you were collecting
14 these items?

15 A No. He just waited in his car outside.

16 Q Were your parents there?

17 A I don't recall.

18 Q Was it -- do you know if anyone was there?

19 A I'm sure someone was there because they
20 let me in. I don't know if it was my mom or my
21 dad.

22 Q And you didn't tell anyone that you were
23 being trafficked and that they needed to help you?

24 A No. Again, [REDACTED] was in the car. He
25 does have guns, multiple guns. And that's

1 something he specifically forbade me, like don't
2 tell your parents, don't tell teachers, don't tell
3 police if you get arrested.

4 So no, he was right outside my parents'
5 house with weapons, so no, I didn't go try to tell
6 them.

7 Q At that point, did you want to leave him?

8 A At this point, I definitely think that I
9 had realized that, you know, maybe I had made a
10 mistake leaving -- leaving my parents' house.

11 Q So you did want to leave him at this point
12 or you were still thinking about it?

13 A Yes, you could say I was thinking about
14 it, yeah.

15 Q So at this point, were you -- at this
16 point, you were still choosing to stay with him?

17 A Yeah, you could say that.

18 Q All right. And the next time, at
19 Thanksgiving, was this in 2010?

20 A I think it might have been in 2011.

21 Q Okay.

22 A Yeah, it would have -- it would have had
23 to be in 2011.

24 Q So you think you were still with [REDACTED]
25 at least through Thanksgiving of 2011?

1 A Let's see. Well, no, I graduate in 2010,
2 in May, that wraps up the year. Yeah.

3 Q Okay. So at Thanksgiving 2011, you're
4 still with [REDACTED] and you go to your family's
5 Thanksgiving?

6 A Yeah.

7 Q All right. And is [REDACTED] there?

8 A No.

9 Q No. Is this at your house at 185
10 Brightmore?

11 A Yes.

12 Q All right. Who all was there?

13 A It's hard to say definitively, but my mom
14 and dad were definitely there, my brother, possibly
15 my sisters, nieces and nephews.

16 Q So --

17 A A pretty big family gathering.

18 Q All right. Did you tell anyone there that
19 you were being trafficked?

20 A No.

21 Q All right. Why not?

22 A The same situation, mentally being
23 controlled, being told not to tell anybody. Also
24 fearing physical retaliation, [REDACTED] told me, you
25 know, if I tried to leave him or get in trouble,

1 that he would try to hurt me or my family. He did
2 know where my family stays. So no, I didn't tell
3 them.

4 Q So besides the threats, what mental
5 control did he have over you?

6 A I think verbal threats are pretty
7 significant. He also did things to wear down my
8 self-esteem. He did give me, like, a branding
9 tattoo to show that he owned me of an eye. Told me
10 he could always see what I was doing, see what I
11 was saying, see -- know what I was telling other
12 people.

13 And it sounds kind of stupid now, but he
14 was pretty convincing with making it seem like
15 these things were true and would definitely happen.

16 Q When you say "branding tattoo," so is it
17 an ink tattoo?

18 A Yeah, a regular tattoo with a needle.

19 Q And what is it of?

20 A I got a coverup, but it was of an eye.

21 Q Okay. What is it covered up with?

22 A Africa, the continent of Africa.

23 Q Okay. So you can't see it at all anymore?

24 A No.

25 Q Okay. All right. Why did you choose to

1 A Yeah.

2 Q Just from 2010 to 2011?

3 A Yes.

4 Q And those were all with [REDACTED]?

5 A Yeah. I mean, some of those hotels, you
6 know, we might have only stayed at once, but others
7 we did stay at more often.

8 Q And did you say that you stayed at the
9 InTown Suites in Buckhead the most?

10 A No, I wouldn't say that. I just said
11 that's where we started.

12 Q Okay. Is there one you frequented --
13 sorry. I can't speak today. Is there one you went
14 to the most compared to any of the others?

15 A We did, of course, go to Red Roof a lot.
16 It was one of the ones with weekly rates. Other
17 than that, we really -- it was just really at
18 random.

19 Q Okay. Were you working every day when you
20 were with [REDACTED]? And by working, I mean,
21 engaging in commercial sex.

22 A I can't say literally every day, but yeah,
23 I worked -- I worked almost every day, multiple --
24 at least five or six -- five, six days a week.

25 Q And how many clients would you see each

1 day that you worked?

2 A Usually at least three a day. It usually
3 wouldn't get to be more than 10 a day. The
4 average, probably four or five.

5 Q So on average, you were working five to
6 six days a week, and each day you would see at
7 least three, no more than ten, clients a day?

8 A Yeah.

9 Q But normally the average --

10 A About five.

11 Q -- clients, four to five?

12 All right. Did you go to any hotels with
13 [REDACTED] outside of Georgia?

14 A Yes, but I can't recall the name. We did
15 go to a hotel in South Carolina.

16 Q Just one hotel?

17 A Yes.

18 Q All right. Any other states?

19 A One in D.C. I also don't recall the name.

20 Q Just one hotel?

21 A Yes.

22 Q So for the hotel in South Carolina, how
23 long did you stay at the hotel?

24 A Less than a week.

25 Q How many clients did you see?

1 know, normal boyfriend-type stuff.

2 But, I mean, it didn't take long for him
3 to, like, just flip the script, start making me
4 do -- start wanting me to work more and start
5 imposing quotas and getting angry, you know, if I
6 didn't make enough money for him.

7 So for a majority of the time that I was
8 forced to work for him, we really didn't do -- have
9 much downtime.

10 Q What was your quota?

11 A They really just changed based on his
12 moods. Like if he, for whatever reason, thought
13 that it was a good time to make a lot of money,
14 like, I don't know if a lot of people were calling
15 your phone or he saw a lot of traffic where you're
16 at, then he might be expecting you to just make
17 thousands and thousands of dollars.

18 Other days, if he was in a better mood,
19 then he might not want you to make as much money.
20 At, like, hotels like the Red Roof that were, like,
21 really busy with action and prostitution, the
22 quotas would be higher.

23 Q How much money do you think you made for
24 [REDACTED] while you were with him total?

25 A I don't know. I'd have to think about

1 that for a second.

2 Q We can take a second. You can give me a
3 minimum/maximum if you can come up with that.

4 On the next break, if you could just take
5 a second and maybe come up with -- if you've got to
6 think about how much, we can figure it out later,
7 but we'll move on.

8 Did you ever get to keep any of the money?

9 A No.

10 Q Not once ever?

11 A The only times I kept any money was when I
12 got back from Barbados and tried to leave him for
13 those few weeks. Other than that, no, I never got
14 to keep any of the money.

15 Q So only time was when you were back from
16 Barbados by yourself doing independent work?

17 A Yeah, for two or three weeks while I tried
18 to leave him for good but was unsuccessful.

19 Q The money that you made, was it ever used
20 to pay for things for you?

21 A Yes, [REDACTED] bought me food before.

22 Q Anything else?

23 A Nails so I'd look good for my clients.
24 Clothes so I could wear on dates. That's really
25 the extent to it. Things needed to look good for

1 police officer in my face who forced me to do
2 sexual services. So I could have possibly been a
3 little mistrusting of the police having just been
4 raped by somebody coming to me under the guise of
5 being a police officer.

6 I mean, [REDACTED] had also been coaching me,
7 telling me if the police come, then -- if the
8 police come for any reason, then you can't tell
9 them what's going on. If you tell them what's
10 going on, then, you know, me and you are going to
11 have problems. I could hurt you. I could hurt
12 your family.

13 I'm sure if I told -- gave the police any
14 inkling of what was going on, that after they left,
15 that I probably would have gotten severely beat.
16 So no, that didn't seem advisable.

17 Q The man who raped you, so you don't think
18 he was actually a police officer, you think he was
19 pretending to be a police officer?

20 A I really don't know. But I do know he
21 presented a genuine-looking police badge.

22 Q Okay. So that's a pretty traumatizing
23 event, right?

24 A Yeah.

25 Q And you think this was at the La Quinta?

1 least since April?

2 A Or May, yeah, of 2010.

3 Q Was this the first time you had been
4 arrested?

5 A We're talking about this rape incident,
6 right?

7 Q Oh, I'm sorry. Was this the first time
8 you called the police?

9 A I'm not sure.

10 Q Okay. All right. So this was one
11 instance where you called the police. Can you
12 recall any others during 2010 or 2011?

13 A No, not off the top of my head.

14 Q Okay. And so we've established that your
15 alleged trafficking with [REDACTED] ended sometime in
16 2011, most likely after Thanksgiving?

17 A Yes.

18 Q And I know you have mentioned a few times
19 that you called a hotline, they connected you to
20 support services, and that's what helped you leave
21 [REDACTED] right?

22 A Yes.

23 Q Can you just walk me through in a little
24 bit more detail exactly how that happened, why you
25 decided to call the hotline, you know, what brought

1 to leave but were ultimately unsuccessful because
2 he, I think you said, he sucked you back in. What
3 made this time different?

4 A I guess having a place to really get away
5 and unplug from him. You know, I didn't have
6 access to my computer or phone for such a long
7 time, he didn't have a way to reach out to me.
8 And, yeah, it was definitely, definitely helpful in
9 leaving and being able to stay away.

10 Q So what prevented you from being able to
11 stay away from him if you had just gone back to
12 your parents' house?

13 A I don't think we can just invite myself
14 back to my parents' house and say that they'll
15 welcome me because I don't think that would have
16 been the case.

17 I was also kind of scared to go back to my
18 parents' house. Again, [REDACTED] carries guns. He
19 threatens me. He knows where my parents live. So
20 I could go back there, and it would be a great
21 place for him to come find me. He would definitely
22 know where I was. Whereas, at the safe house, he
23 didn't have the location and he couldn't contact
24 me.

25 Q Did you ever see [REDACTED] get physical with

1 anyone else?

2 A Yes.

3 Q Who?

4 A Let's see. He was violent with [REDACTED]
5 who's listed in the thing. Other than that, I'm
6 not sure that I really did witness other violence,
7 really just heard about it and heard threats of it.
8 But I did see him physically assault [REDACTED].

9 Q But never any -- you never saw him
10 physically assault anyone besides her?

11 A The girl who stayed at InTown Suites,
12 [REDACTED] he also assaulted her.

13 Q Who? I'm sorry.

14 A [REDACTED]

15 Q Who is that?

16 A Someone who was at InTown Suites.

17 Q I don't think we went over her. How do
18 you know her?

19 A She was around when we -- when I first
20 started hanging out with [REDACTED] while he was
21 introducing the modeling to me, but I hadn't done
22 any jobs yet.

23 Q Was she a prostitute?

24 A No.

25 Q She was just hanging out? Like what was

1 A No, that can't be right. I need a
2 calculator.

3 Q Would you like a calculator?

4 A Yeah. Thanks.

5 Q You're welcome.

6 A I'd estimate about 120,000.

7 Q \$120,000?

8 A Yeah.

9 Q All right. And what did you -- what did
10 you write down on the paper?

11 A Math that I can't do, but my
12 justification --

13 Q I'm with you.

14 A My justification for doing this math was
15 thinking I made about \$500 a day, at least five
16 days a week, for about 12 months.

17 Q All right. Okay. So estimate \$120,000 a
18 year, I mean, total while you were with [REDACTED].

19 Okay. Now I think we're still on your
20 supplementary -- or your original response to
21 interrogatory number 12 where you kind of give your
22 timeline of being with [REDACTED] and being at Red
23 Roof Inn Smyrna. And you state on page 19 that
24 [REDACTED] trafficked you at Smyrna Red Roof Inn for
25 several months starting in November 2010. So was

1 the first time you were ever at Red Roof Inn
2 Smyrna, was that November 2010?

3 It's second to last paragraph, first
4 sentence.

5 A Yeah.

6 Q Okay. It goes on to say that you were
7 trafficked at this hotel about five times. So in
8 2010, since you were there first time November, in
9 those two months of 2010, how many stays were you
10 there? How many -- how many stays did you have at
11 Red Roof Smyrna?

12 A So between 2010 and 2012, after November,
13 how many times did I stay at Red Roof?

14 Q No. I just mean in 2010, just November
15 and December, like before 2011, just in 2010, how
16 many of those five stays took place?

17 A I'm not positive, but probably one.

18 Q One, okay. And do you know how long?

19 A No, I don't know specifically. But when
20 we stayed there, it was usually for a couple of
21 days to a week.

22 Q Okay. Do you have any memory of your
23 first time at Red Roof Smyrna?

24 A I mean, I remember going to a new style of
25 hotel and remembering what it looked like. I'm not

1 A Yes.

2 Q Was that the number posted on online
3 advertisements?

4 A Yes.

5 Q All right. And can you walk me through
6 how the process worked of, you know, getting a john
7 to the Red Roof?

8 A Sure. [REDACTED] would post an ad for me on
9 usually Backpage. Meantime, we'd wait for people
10 to call the ad. He'd also have me walk around the
11 area of the Red Roof and the street the Red Roof
12 was located on, Corporate Plaza, he'd have me walk
13 that area looking for johns while waiting for phone
14 calls.

15 If I found a john, like, on the street,
16 I'd usually get in his car and we'd drive back to
17 my room. I'd call [REDACTED] so he could get out of
18 the room because he'd usually hang out -- hang out
19 in the room while I was out walking around looking
20 for clients. And he would leave, and we'd go in
21 the room, or if somebody called me, then I'd have
22 [REDACTED] leave. And the client would come up to the
23 room while [REDACTED] was nearby to kind of survey
24 things.

25 Q Did you ever post any of the online ads

1 A Yeah.

2 Q When you were at Red Roof Smyrna, did you
3 ever call housekeeping?

4 A I mean, from my memory, they just came
5 around voluntarily. I would ask the housekeeping
6 ladies for stuff if I saw them around. But it's
7 not like you had to call -- like with COVID now,
8 you have to call and ask them to come clean your
9 room for you. It's just something they
10 automatically do on a schedule.

11 Q And what did you ask them for?

12 A Sometimes towels, sheets. We go through
13 sheets a lot, just ask for extra sheets. It's
14 usually what I would ask them for.

15 Q Did you speak to any other employees
16 besides housekeeping?

17 A I did speak to people at the front desk
18 sometimes usually to ask about internet-related
19 issues.

20 I also may go down there to put, like,
21 cash on the room. Like if we originally were just
22 going to stay for one night, then I could go down
23 there and add more money.

24 Occasionally, go out there if your key got
25 messed up, they'll get messed up if they touch a

1 cellphone, it will stop working and letting you in
2 the room.

3 These are reasons I would go down there.

4 Q And you never told any of those employees
5 that you were being held against your will?

6 A No.

7 Q Do you think that they should have known
8 that you were being allegedly trafficked?

9 A Yeah, I think they should have known.

10 Q How would they have known?

11 A Of course, [REDACTED] came and rented the
12 room for me because I wasn't old enough. We always
13 asked about things like the internet working, but,
14 you know, weren't really dressed like in business
15 attire, like we were business people, so I think
16 that might raise alarm.

17 He did have me walking around in the area
18 with, like, clothes so I could catch dates. So
19 I'd, like, wear high heels, really short shorts,
20 crop tops, try to walk around and find dates on the
21 hotel premises.

22 And when I tried to do things like that at
23 other hotels, typically, they would call the police
24 for loitering or ask you to leave or tell you to
25 go, to go hang out in your room. And at this

1 hotel, it just seemed like it was fine. I feel
2 like -- I kind of feel like they knew; like, they
3 just didn't care.

4 Q Why is a guest asking for internet -- why
5 would that cause alarm? Isn't that a pretty
6 typical request?

7 A It is. But I feel like any normal person,
8 like -- I don't know. I can't speak prior to when
9 I met [REDACTED] I didn't stay in that many hotels.
10 But I would imagine most, like, if you went to a
11 hotel, you would just expect the internet to work.
12 You wouldn't have to ask if it was going to work.
13 And then you wouldn't -- you wouldn't, like, freak
14 out when it wasn't working because, I don't know,
15 you couldn't post an ad. I just feel like we're
16 kind of in there about the internet acting -- just
17 acting odd and suspicious.

18 Q Okay.

19 A But I wouldn't say that's the biggest
20 reason they should have known. I mean, they should
21 have known because we were out walking around,
22 walking up to cars, getting dates, having multiple
23 guests go in and out of the room. I think those
24 things seem like real obvious.

25 Q The entrances to each individual room at

1 the Red Roof Smyrna, they're outside, right?

2 A Yes.

3 Q Like you don't have to walk in -- you
4 don't have to walk by the front desk to get to the
5 room?

6 A No.

7 Q So how would they know that multiple
8 guests are going in and out of the room?

9 A It's a pretty rough area. I would hope
10 that they would have cameras to protect their
11 guests. Maybe they didn't, but if they had
12 cameras, I would assume they would have security
13 and someone watching the cameras.

14 But there was -- I mean, if someone was
15 watching, then it seems like they didn't care. Or,
16 I mean, maybe they allowed it to happen because, of
17 course, we would go and we would rent the rooms and
18 we would bring money to the rooms. Seemed like,
19 like, almost everyone that stayed there was always
20 loitering or walking around trying to find a date
21 or was a guy with a bunch of girls.

22 I guess they took our money because nobody
23 else would want to stay there. Like it wasn't a
24 place to bring your family. So if we weren't going
25 to pay to rent the room, then who was going to pay

1 Q Did you do it this morning?

2 A No.

3 Q When was the last time you did coke?

4 A Before I went to the New Beginnings.

5 Q Okay. So how often would you do coke with

6 [REDACTED]?

7 A It was more frequent towards, I guess, the
8 middle and end of our time being together. It
9 could be daily then, but it didn't -- it didn't
10 start like that.

11 Q And how often did you take X?

12 A No more than three times.

13 Q Okay. Did y'all ever go out to, like,
14 clubs or do any, like, fun activities when you
15 weren't working?

16 A Not really. He snuck me into a club one
17 time, but you have to remember, I was under 21 and
18 he didn't have any type of fake ID for me, so...

19 Q So just one time or --

20 A One time we went to a club, yes.

21 Q Did you -- I think you mentioned earlier
22 that I know he would pay to get your nails done,
23 right?

24 A Yes, for work, so I'd look good for the
25 clients.

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CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

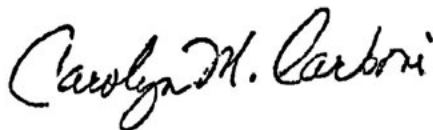
I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

This the 12th day of September, 2022.



CAROLYN M. CARBONI, RPR, RMR, CCR-B-878